

1 Law Offices of Travis Gagnier, Inc., P.S.  
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Honorable Mary Jo Heston  
CHAPTER 13

7 UNITED STATES BANKRUPTCY COURT  
8 WESTERN DISTRICT OF WASHINGTON

9 IN RE:

No. 23-41529

10 **WEBB, Hughie Lee Jr.,**

11 Debtor

**EX PARTE APPLICATION TO APPOINT  
JOHNSON LAW GROUP AS SPECIAL  
COUNSEL FOR DEBTOR and PROOF OF  
SERVICE**

12 COMES NOW, Law Offices of Travis Gagnier, Inc., P.S., Attorney for the Debtor, and  
13 applies to the Court for the appointment of Johnson Law Group as special counsel.

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- 15 1. This case was filed on September 8, 2023, and Michael G. Malaier was appointed the  
16 Chapter 13 Trustee.
  - 17 2. The assistance of Johnson Law Group is necessary to represent the Debtor regarding a  
18 class action lawsuit against 3M Combat Arms Earplugs, which caused Debtor bodily  
19 injury.
  - 20 3. The Debtor signed the June 23, 2020, Employment Agreement from Johnson Law  
21 Group regarding this matter. A copy of the Employment Agreement is attached to  
22 counsel's Declaration.
  - 23 4. Neither Dana Lizik nor Johnson Law Group hold an adverse interest to the Debtor, any  
24 creditor, or other party in interest or their respective attorneys or accountants and  
25 represents no interest adverse to the estate and are not creditors in this estate.

26 APPLICATION TO EMPLOY SPECIAL COUNSEL AND PROOF  
27 OF SERVICE - 1

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1 WHEREFORE, it is requested that this court enter into an Order appointing Johnson Law Group  
2 as special counsel.

3 Dated this 22nd day of January 2024.

4 Law Offices of Travis Gagnier, Inc., P.S.  
5 Attorneys for Debtor

6 /s/ Travis A. Gagnier  
7 Travis A. Gagnier, WSBA #26379  
8 Gregory Jalbert, WSBA #9480  
9 Of Counsel

10 I declare under penalty of perjury that I served a true copy of this pleading along with a  
11 copy of the Declaration of Dana Lizik in Support of Employment as Special Counsel and a copy  
12 of the Order regarding this matter to: Chapter 13 Trustee via ECF on the date set forth above.  
13

14 /s/ Shari L. Moody  
15 Shari L. Moody, Sr. Paralegal  
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